

1 Michael H. Bierman, State Bar No. 89156
2 Jeffrey D. Wexler, State Bar No. 132256
3 Michael E. Pappas, State Bar No. 130400
4 LUCE, FORWARD, HAMILTON & SCRIPPS LLP
5 601 S. Figueroa, Suite 3900
6 Los Angeles, California 90017
7 Telephone: 213.892.4992
Facsimile: 213.892.7731
E-Mail: mbierman@luce.com
mpappas@luce.com
jwexler@luce.com

8 Attorneys for Plaintiff and Counterdefendant National Credit Union Administration
- Board As Liquidating Agent For Western Corporate Federal Credit Union

UNITED STATES DISTRICT COURT
CENTRAL DISTRICT OF CALIFORNIA
WESTERN DIVISION

3 NATIONAL CREDIT UNION
4 ADMINISTRATION BOARD AS
5 LIQUIDATING AGENT FOR
WESTERN CORPORATE FEDERAL
CREDIT UNION.

-6 Plaintiff

7 | v.

8 ROBERT A. SIRAVO, TODD M. LANE,
9 ROBERT J. BURRELL, THOMAS E.
10 SWEDBERG, TIMOTHY T. SIDLEY,
11 ROBERT H. HARVEY, JR., WILLIAM
12 CHENEY, GORDON DAMES, JAMES
13 P. JORDAN, TIMOTHY KRAMER,
14 ROBIN J. LENTZ, JOHN M. MERLO,
15 WARREN NAKAMURA, BRIAN
16 OSBERG, DAVID RHAMY and
17 SHARON UPDIKE.

24 Defendants.

Case No.: CV10-01597 GW (MANx)

**STIPULATION RE ENTRY OF
ORDER GOVERNING USE AND
DISSEMINATION OF
CONFIDENTIAL INFORMATION**

[DISCOVERY MATTER]

[DISCOVERY MATTER]

1 WHEREAS, plaintiff and counterdefendant the National Credit Union
2 Administration Board as Liquidating Agent for Western Corporate Federal Credit
3 Union (the “NCUA”) and defendants and counterclaimants Robert A. Siravo,
4 Thomas E. Swedberg, Timothy T. Sidley, Robert J. Burrell, and Todd M. Lane
5 (collectively, the “Officer Defendants”), anticipate that discovery will require them
6 to produce documents and information that each deems to be privileged, confidential
7 and proprietary; and

8 WHEREAS, the NCUA and the Officer Defendants believe that discovery in
9 this matter would be facilitated if the Court were to enter a protective order to
10 govern the dissemination and use of privileged, confidential and proprietary
11 documents and information to be produced in this matter;

12 IT IS STIPULATED by and between the NCUA and the Officer Defendants
13 that the Court may enter a protective order in the form attached hereto as Exhibit A.
14

15 Dated: November 23, 2011 LUCE, FORWARD, HAMILTON & SCRIPPS LLP
16 Michael H. Bierman
17 Jeffrey D. Wexler
18 Michael E. Pappas

19 By: /s/ Michael H. Bierman
20 Michael H. Bierman
21 Attorneys for Plaintiff and Counterdefendant
22 National Credit Union Administration Board
23 As Liquidating Agent For Western Corporate
24 Federal Credit Union

25 Dated: November 23, 2011 ORRICK, HERRINGTON & SUTCLIFFE LLP
26 Kent B. Goss
27 Seth E. Freilich

28 By: /s/ Seth E. Freilich
29 Seth E. Freilich
30 Attorneys for Defendant and Counterclaimant
31 Timothy T. Sidley

1 Dated: November 23, 2011

PILLSBURY WINTHROP SHAW PITTMAN LLP
Reynold L. Siemens
Bruce A. Ericson
Marley Degner

3

4

By: /s/ Bruce A. Ericson
Bruce A. Ericson
Attorneys for Defendant and Counterclaimant
Robert John Burrell

7

8

9

10

11

12

13

14

15

16

17

18

19

20

21

22

23

24

25

26

27

28

201188252.1

29

30

31

32

33

34

35

36

37

38

MUNGER, TOLLES & OLSON LLP
Richard E. Drooyan
Laura Smolowe

By: /s/ Richard E. Drooyan
Richard E. Drooyan
Attorneys for Defendants and Counterclaimants
Robert A. Siravo and Thomas E. Swedberg

CHAPIN FITZGERALD SULLIVAN & BOTTINI
LLP
Kenneth M. Fitzgerald
Curtis G. Carll

By: /s/ Kenneth M. Fitzgerald
Kenneth M. Fitzgerald
Attorneys for Defendant and Counterclaimant
Todd M. Lane